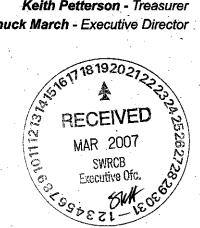


Jeff Gleaves - President
Bob Gayaldo - 1st Vice President
Rob Suenram - 2nd Vice President
Keith Petterson - Treasurer
Chuck March - Executive Director

4/3/07 BdMtg Item 4

Clear Lake

Deadline: 3/19/07 noon



March 19, 2007

Ms. Song Her Clerk to the Board State Water Resources Control Board P. O. Box 100 Sacramento, CA 95812-0100

SUBJECT: Proposed Total Maximum Daily Load for Nutrients for Clear Lake

Dear Ms. Her,

This letter is in response to the proposed amendment to the Water Quality Control Plan for the Sacramento River and San Joaquin River Basins for the Control of Nutrients in Clear Lake.

We recognize load allocations need to be assigned to the various stakeholders with in the Clear Lake Basin. However, Lake County Farm Bureau, representing the Irrigated Agricultural Lands in Lake County, would like to go on record as opposing irrigated agriculture being named as a responsible party within the framework of the TMDL for the following reasons.

- Lake County Community Development Department currently lists approximately 59,451 acres zoned agriculture in the county.
- The State Department of Water Resources (2001 data) estimates approximately 28,000 acres in some type of agriculture.
- The Lake County Agricultural Commissioner's Crop Report estimates approximately 16,000 acres throughout the county as irrigated crop production.
- The Lake County Irrigated Agricultural Lands program has approximately 13,298 acres
  participating in the waiver program. This includes many acres not lying within the Clear
  Lake Basin drainage.
- The 13,298 acres of irrigated agricultural land are interspersed with many residential ranchettes that do not irrigate a commercial crop and are not included within the irrigated lands program. Current Lake County figures show that more than 25% of the currently agricultural zoned properties are 5 acres and less.

Therefore, we believe that with this type of land use pattern, it would be impossible to estimate loading from irrigated agricultural land. All agricultural land, both irrigated and non-irrigated should fall under the reporting structure of Lake County. We have had these discussions with Lake County Department of Water Resources and they are in agreement.

Lake County Farm Bureau would also agree with the letter submitted by Lake County's Department of Water Resources, with attachments, dated March 15, 2007 and that the information used for the creation of the Target Report is outdated and paints an inaccurate picture of the current conditions of Clear Lake, and their nonsupport of the Nutrient TMDL for Clear Lake with numeric waste load allocations.

Sincerely, March

Chuck March

Executive Director